

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF OKLAHOMA**

(1) GREAT LAKES INSURANCE SE,)	
)	
Plaintiff,)	
)	
v.)	Case No. CIV-23-52-JAR
)	
(1) WAGNER & LYNCH, PLLC,)	
)	
Defendant.)	

JOINT STATUS DISCOVERY REPORT

The Parties respectfully submit this Joint Status Discovery Report as required under the First Amended Scheduling Order (Dkt. # 39) in this case. The categories and information detailed herein specifically address the topics listed by the Court in its Order. Dkt. # 39, p. 2.

1. The date written discovery was issued by each party:

Great Lakes issued written discovery requests to Wagner & Lynch on June 20, 2023. Likewise, Wagner & Lynch issued written discovery requests to Great Lakes on July 6, 2023.

2. The date written discovery was responded to by each party:

Wagner & Lynch responded to Plaintiff's discovery requests on July 22, 2023.

Great Lakes responded to Defendant's discovery requests on August 8, 2023.

3. The number of documents provided in discovery by each party:

Great Lakes has produced a total of 756 pages of documents to date and has also produced 304 pages of documents obtained via subpoena to FloodServ. Wagner & Lynch has produced 406 pages of documents to date.

4. The names and dates of witnesses who have been deposed:

<u>Name:</u>	<u>Date of Deposition:</u>
Blake Lynch Wagner & Lynch	August 11, 2023
Keith Heaslet Superior Plumbing	July 28, 2023

5. The names of all witnesses that remain to be deposed prior to the discovery cut off:

Randy Howard

Adrian Nyunt

John Thill

Todd Nave

Nils Rauniker

Amanda LittleJohn

6. A list of any subpoenas issued by each party and the number of documents obtained as a result of that subpoena:

<u>Issued to:</u>	<u>Number of Documents:</u>
Baytown Construction	None
Superior Plumbing	None
FloodServ	9 documents (304 pages)
Nils Rauniker	None

7. Any discovery issues that should be brought to the court's attention at this time.

It may be required to employ the Hague Convention Legal Service procedure to secure deposition of international witness(es); if so, it is possible that discovery and related deadlines may need to be extended.

Read and Approved by:



Michael S. Linscott, OBA No. 17266
Alexandra J. Gage, OBA No. 33874
Two West Second Street, Suite 700
Tulsa, Oklahoma 74103
918-591-5271 (p)
918-925-5271 (f)
Mlinscott@dsda.com
agage@dsda.com

Attorneys for Plaintiff



Wesley J. Cherry, OBA No. 22851
FOUNDATION LAW, PLLC
P.O. Box 758
McAlester, Oklahoma 74502
918-839-6353 (p)
888-622-3181 (f)
wes.foundationlaw@gmail.com
www.foundationlawfirm.com

Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of December, 2023, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Wesley Cherry
Wes.foundationlaw@gmail.com

I further certify that on the 1st day of December, 2013, I served the foregoing document on the following, who are not registered participants of the ECF System, by , to:

None

s/ Alexandra J. Gage

8001376.1

8142595.1